

FILED

DEC 11 2023

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY _____ DEPUTY CLERK

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Plaintiff: DAMIAN EARLY

) Case NO.: 2:23-CV-02405-DJC-JDP

) Answer

VS.

Defendant: RENE DENISE HARDING

NOW COMES DEFENDANT, who's true and correct name is Rene Denise Harding, who files this Answer to the Unverified Complaint and Affirmative Defenses to Plaintiff's unverified allegations, complaint and states the following:

As a first, separate and distinct, affirmative defense to the plaintiff's complaint and each cause of action therein, Defendant hereby denies, each of all of the allegations contained in the Complaint and denies that the Plaintiff is entitled to any relief against this answering defendant.

As a second, separate and distinct, affirmative defense to Plaintiff's complaint and each cause of action therein, this Defendant denies & disputes that the Plaintiff sustained any damages. Plaintiff has not provided and or produced any evidence; copies, witnesses, testimonies, statements, recordings, receipts, memos, faxes and or any proof to justify this inflated, predatory and frivolous complaint.

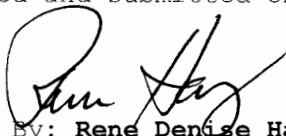
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2 As a third, separate and distinct, affirmative defense to plaintiff's
3 complaint and each cause of action therein, Defendant alleges that the
4 Plaintiff is barred from asserting any causes of action against answering
5 Defendant by the doctrine of waiver.

6
7 As a fourth, separate and distinct, affirmative defense to the plaintiff's
8 complaint and each cause of action therein, defendant alleges the Plaintiff
9 is barred from asserting any causes of action against this answering
10 Defendant by the doctrine of unclean hands.

11
12 As a fifth, separate and distinct, affirmative defense to the plaintiff's
13 complaint and each cause of action therein, Defendant alleges that Plaintiff
14 lacks standing to sue in this action. This answering Defendant respectfully
15 requests that this Court dismiss Plaintiff's complaint with prejudice.

16
17 Wherefore this Defendant prays that Plaintiff and or attorney receive nothing
18 and that the defendant recovers her costs for answering this complaint and or
19 any other relief the Court deems proper and just.

20
21 Respectfully signed and submitted on this 9th day of December 2023.

22 

23 By: Rene Denise Harding, Defendant In Pro Per
24
25

Proof of Service - Civil

Case No: **2:23-CV-02405-DJC-JDP**


At the time of service, I was over the age of 18; My Address is 8066 Sunset Ave Suite 102 Fair Oaks, CA 95628, which is located in Sacramento County, where this mailing occurred on December 11, 2023, I served the **answer** to the complaint to:

John Vondonick Law, attorneys for plaintiff

P.O. Box 763 Nevada City, CA 95959

The documents were served by the following method(s): By U.S. First Class Mail - I deposited the sealed envelope with the U.S. Postal Service, with postage fully prepaid.

I declare under penalty of perjury under the laws of this State of California that the foregoing is true and correct, executed on December 11, 2023


By: Tracy A. Blake

VERIFICATION

I **Rene Denise Harding**, am a party to this matter [case # 2:23-CV-02405-DJC-JDP]. I have read the foregoing **Answer** and know the contents thereof to be true and correct to my own personal knowledge, except as to those matters stated therein upon information and belief, in which case I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct and that this verification was executed on the 9th day of December 2023, at Sacramento, CA.



Rene Denise Harding